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*Attorneys for Lead Plaintiff Richard Worley  
and the Proposed Settlement Class*

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

COURTNEY ELKIN, Individually and on  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

WALTER INVESTMENT MANAGEMENT  
CORP., GEORGE M. AWAD, ANTHONY  
N. RENZI, and GARY L. TILLET,

Defendants.

Case No.: 2:17-cv-02025-JCJ

**LEAD PLAINTIFF'S UNCONTESTED  
MOTION FOR FINAL APPROVAL OF  
SETTLEMENT, CLASS CERTIFICATION,  
AND APPROVAL OF PLAN OF  
ALLOCATION**

Pursuant to Rule 23(e) of the Federal Rules of Civil Procedure, Lead Plaintiff Richard Worley hereby moves this Court, before the Honorable J. Curtis Joyner, on December 5, 2018 at 10:30 a.m. in Courtroom 17-A of the United States District Court for the Eastern District of Pennsylvania, James A. Byrne U.S. Courthouse, 601 Market Street, Philadelphia, PA 19106, or at such other location and time as set by the Court, to enter a judgment and order (i) granting final approval of the settlement of this litigation; (ii) granting class certification for settlement purposes; and (iii) approving the Plan of Allocation of settlement proceeds and the form of Notice.

This Motion is based on the Declaration of Lee Albert in Support of (I) Lead Plaintiff's Motion for Final Approval of Class Action Settlement, Class Certification, and Plan of Allocation, (II) and Plaintiff's Counsel's Motion For an Award of Attorneys' Fees and Reimbursement of Litigation Expenses, the Memorandum of Law in Support of Lead Plaintiff's Motion for Final Approval of Settlement, Class Certification, and Approval of Plan of Allocation, and all other papers and proceedings herein. A proposed Judgment and Order Approving Class Action Settlement, which was negotiated by the parties to the Settlement, and a proposed Order Approving Plan of Allocation of Net Settlement Fund are also submitted herewith.

Pursuant to Local Rule 7.1(b), I certify that this motion is uncontested.

Dated: October 31, 2018

Respectfully submitted,

**GLANCY PRONGAY & MURRAY LLP**

By: /s/ Lee Albert  
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*Lead Counsel for Lead Plaintiff and the Proposed  
Settlement Class*

**PROOF OF SERVICE**

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On October 31, 2018, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Eastern District of Pennsylvania, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on October 31, 2018.

*s/ Lee Albert*  
Lee Albert